

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LAUREN ASHLEY MORGAN; ERIK
BARNES; SHERRY BASON; LOIS WINN;
GEORGES EMMANUEL NJONG DIBOKI;
JULIA SIMS; and SOPHIA WOODLAND,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

REALPAGE, INC.; GREYSTAR REAL
ESTATE PARTNERS, LLC; LINCOLN
PROPERTY CO.; CUSHMAN &
WAKEFIELD, INC.; FPI MANAGEMENT,
INC.; RPM LIVING, LLC; BH
MANAGEMENT SERVICES, LLC; MID-
AMERICA APARTMENT COMMUNITIES,
INC.; MORGAN PROPERTIES, LLC;
AVENUE5 RESIDENTIAL, LLC;
BOZZUTO MANAGEMENT COMPANY;
AVALONBAY COMMUNITIES, INC.;
HIGHMARK RESIDENTIAL, LLC;
EQUITY RESIDENTIAL; THE IRVINE
COMPANY, LLC; ESSEX PROPERTY
TRUST, INC.; ZRS MANAGEMENT, LLC;
CAMDEN PROPERTY TRUST; UDR, INC.;
CONAM MANAGEMENT CORPORATION;
CORTLAND PARTNERS, LLC; THRIVE
COMMUNITIES MANAGEMENT, LLC;
SECURITY PROPERTIES INC.; CWS
APARTMENT HOMES, LLC;
PROMETHEUS REAL ESTATE GROUP,
INC.; SARES REGIS GROUP OPERATING,
INC.; MISSION ROCK RESIDENTIAL,
LLC; and MORGAN GROUP, INC.,

Defendants.

No.: 2:22-cv-01712-RSL

STIPULATED MOTION AND
ORDER SUSPENDING DEADLINES
FOR DEFENDANT CWS
APARTMENT HOMES, LLC TO
RESPOND TO COMPLAINT

Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs Lauren Ashley Morgan, Erik Barnes, Sherry Bason, Lois Winn, Georges Emmanuel Njong Diboki, Julia Sims, and Sophia Woodland (collectively, “Plaintiffs”) and Defendant CWS Apartment Homes, LLC (“CWS”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiffs filed a Class Action Complaint (the “Complaint”) on December 2, 2022. ECF No. 1;

WHEREAS, Plaintiffs and certain other Defendants (“Stipulating Defendants”) entered a Stipulation that, for purposes of judicial efficiency, would temporarily suspend the date for the Stipulating Defendants to file a responsive pleading to the Complaint;

WHEREAS, the Court subsequently entered an Order [ECF No. 83] that, inter alia, suspended the date for the Stipulating Defendants to respond to the Complaint, and required Plaintiffs and the Stipulating Defendants to submit a status report by January 18, 2023 (“January Status Report”);¹ and

WHEREAS, Plaintiffs and CWS believe that judicial efficiency would be served by suspending the date for CWS to move, answer or otherwise respond to the Complaint so that the Court can consider the January Status Report.

In making this stipulation, CWS does not waive, in this or any other action, any (i) defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8; (iii) other statutory or common law defenses that may be available; or (iv) right to seek or oppose any reassignment, transfer, or consolidated alternatives.

¹ Substantially identical stipulations have been entered by this Court in Navarro v. RealPage, Inc. et al., No. 2:22-cv-01552 (W.D. Wash.); Alvarez et al. v. RealPage, Inc. et al., No. 2:22-cv-01617 (W.D. Wash.); Cherry et al. v. RealPage, Inc. et al., No. 2:22-cv-01618 (W.D. Wash.); and Armas et al. v. RealPage et al., No. 2:22-cv-01726 (W.D. Wash.).

1 THEREFORE, Plaintiffs and Defendant CWS Apartment Homes, LLC stipulate and agree
2 to suspend the deadline for CWS Apartment Homes, LLC to answer, move to dismiss, or otherwise
3 respond to the Complaint and request that the Court enter the proposed order pursuant to this
4 stipulation.

5 DATED this 18th day of January, 2023.

6 HAGENS BERMAN SOBOL SHAPIRO LLP STOKES LAWRENCE, P.S.

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14 Winn, Georges Emmanuel Njong Diboki, Julia
Sims, and Sophia Woodland Individually and
on Behalf of All Others Similarly Situated

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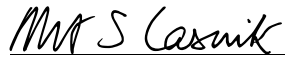
ORDER

THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for Defendant CWS Apartment Homes, LLC to Respond to the Complaint. Now, therefore,

IT IS HEREBY ORDERED THAT:

Consistent with this Court's Order of December 21, 2022 [ECF No. 83], the deadline for Defendant CWS Apartment Homes, LLC to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended pending the Court's consideration of the January Status Report.

Dated this 19th day of January, 2023.



Robert S. Lasnik
United States District Judge